

IN UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF WISCONSIN

---

STEPHANIE RAPKIN,

*Plaintiff,*

*v.*

Case No: 2:23-cv-670

VILLAGE OF SHOREWOOD,  
VILLAGE OF WHITEFISH BAY,  
PETER NIMMER, NICHOLAS MUELLER,  
IAN KUDRYNSKY, THOMAS LIEBENTHAL,  
HALSTON WOLBER, ALI-RAZA GOVANI,  
CODY SMITH, AND JULIA ZURFLUH,

*Defendants.*

---

**STIPULATION FOR PROTECTIVE ORDER**

---

The parties, by and through their respective counsel, hereby stipulate and agree that the entry of the accompanying Protective Order without further notice.

The parties believe that discovery in this case will include confidential personnel files of law enforcement officials, Plaintiff's medical and mental health records, and confidential internal document detailing policy and procedures of law enforcement agencies. The parties agree the attached order will allow for the exchange of relevant discovery while protecting the privacy interests of the parties. In accordance with Fed. R. Civ. P. 26(c)(1), the parties move the Court to adopt and enter the same.

Dated on January 12, 2024,

STRANG BRADLEY, LLC,

By: /s/ James Odell  
John H. Bradley, Wisconsin Bar No. 1053124  
R. Rick Resch, Wisconsin Bar No. 1117722  
James Odell, Wisconsin Bar No. 1131587  
613 Williamson St., Suite 204  
Madison, Wisconsin 53703  
(608) 535-1550  
[John@StrangBradley.com](mailto:John@StrangBradley.com)  
[Rick@StrangBradley.com](mailto:Rick@StrangBradley.com)  
[James@StrangBradley.com](mailto:James@StrangBradley.com)

*Attorneys for Plaintiff Stephanie Rapkin*

CRIVELLO NICHOLS & HALL, S.C.

By: /s/ Steven C. McGaver  
Amy J. Doyle, SBN 1001333  
Steven C. McGaver, SBN 1051898  
710 N. Plankinton Ave., Suite 500  
Milwaukee, WI 53203  
Telephone: (414) 271-7722/Fax (414) 271-4438  
Email: [adoyle@crivellolaw.com](mailto:adoyle@crivellolaw.com)  
[smcgaver@crivellolaw.com](mailto:smcgaver@crivellolaw.com)

*Attorneys for Defendants Village of Shorewood, Peter Nimmer, Nicholas Mueller, Ian Kudrynsky, Thomas Liebenthal, Halston Wolber, Ali Govani, and Cody Smith*

WIRTH + BAYNARD

By: /s/ Amanda E. Melrood  
Amanda E. Melrood, State Bar No. 1089610  
Joseph M. Wirth, State Bar No. 1012080  
Jasmyne M. Baynard, State Bar No. 1099898  
9898 W. Bluemound Road, Suite 2  
Wauwatosa, WI 53226  
Telephone: (414) 291-7979/Fax: (414) 291-7960  
E-mail: [aem@wbattys.com](mailto:aem@wbattys.com)  
[jmw@wbattys.com](mailto:jmw@wbattys.com)  
[jmb@wbattys.com](mailto:jmb@wbattys.com)

*Attorneys for Defendants Village of Whitefish Bay and Julia Zurfluh*